

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of:)	
)	CC Docket No. 95-116
Telephone Number Portability)	

**REPLY COMMENTS OF NTELOS ON MAY 13, 2003 PETITION OF CTIA FOR
DECLARATORY RULING**

NTELOS Inc. submits these reply comments on the Petition for Declaratory Ruling of the Cellular Telecommunications and Internet Association filed with the Federal Communications Commission on May 13, 2003. NTELOS Inc., through its affiliates and subsidiaries (collectively “NTELOS”), is a full service telecommunications provider of wireless and wireline services, with over 280,000 PCS customers in Virginia and West Virginia.

NTELOS agrees that the issues contained in the CTIA petition are vital to the smooth implementation of number portability by wireless carriers. In particular, NTELOS agrees that Service Level Porting Agreements (“SLAs”) are the most efficient means of establishing the carrier-to-carrier arrangements needed for portability. Proportionately, NTELOS must devote a very significant amount of time and resources to implement number portability because we lack the economies of scale possessed by larger carriers. A requirement to negotiate interconnection agreements (and file them for approval) rather than use the SLA template developed by CTIA would add substantially

to our burden and could make it impossible for NTELOS to meet the deadline for portability.

NTELOS also agrees that it is imperative to clarify that all wireless carriers must support nationwide roaming. Customers with pooled or ported numbers that roam onto another CMRS carrier's network must be able to make and receive calls. Verizon Wireless in its comments highlighted the problems created for roamers using services such as short messaging, caller ID, and E911 when wireless carriers have not upgraded to support MIN/MDN separation. NTELOS has implemented the network and systems upgrades to allow MIN/MDN separation and we participate in number pooling. Our PCS customers that roam have indeed encountered the service issues described by Verizon Wireless and other commenters.

Customers who encounter these difficulties attribute them to poor service from NTELOS. They do not understand that the true source of the problem is the CMRS carrier on whose network they are roaming. Call volumes to NTELOS' Customer Care organization has increased as a result, yet NTELOS Customer Care Representatives are powerless to solve the underlying problem with the other carrier's network.

Most significant for NTELOS has been the impact of this issue on our pre-paid roaming (iRoam) customers. If these customers are roaming on networks that have not implemented the MIN/MDN separation, the number delivered to our prepaid system for validation is the MIN rather than the MDN. Consequently, the call is denied. NTELOS has even had cases where the MIN sent by the non-compliant network is a valid MDN for another subscriber. In such cases, the call completes, but minutes or money is deducted from the wrong account.

NTELOS, along with many others in the industry, upgraded its network to support the MIN/MDN separation needed for number pooling. Our customers should not be penalized for NTELOS' efforts – yet that is exactly what is happening when they roam on wireless networks that have failed to implement the separation. The Commission should address this problem promptly.

NTELOS supports the positions contained in CTIA's petition, particularly on the issues of SLA's and nationwide roaming. We ask that the Commission grant the petition and issue rulings consistent with it.

Respectfully submitted,

NTELOS Inc.

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Dated: June 24, 2003

CERTIFICATE OF SERVICE

I, Mary McDermott, hereby certify that I caused copies of the foregoing Reply Comments of NTELOS on the May 13, 2003 Petition of CTIA for Declaratory Ruling to be served by First Class Mail, postage prepaid, on June 24, 2003, on the following:

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